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MEMORANDUM

TO: William L. Harp, M.D.
Executive Director
Virginia Board of Medicine

FROM: Erin L. Barrett
Assistant Attorney General

DATE: February 29, 2016

SUBJECT: *Regulations Governing the Practice of Behavior Analysis*
18VAC85-150-10 *et seq.*

I have reviewed the proposed amendment to the Regulations Governing the Practice of Behavior Analysis, 18VAC85-150-10 *et seq.* The proposed amendments alter the requirements for reactivation and renewal of a license as a behavior analyst or assistant behavior analyst. The Board has the statutory authority to amend these regulations under Virginia Code §§ 54.1-2400(6) and 54.1-2957.16. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.